

REMEDIAL SITE ASSESSMENT DECISION EPA - REGION 5

SITE NAME: Ford Motor Co. Lorain EPA ID# OH0004227815

ALIAS SITE NAME(S): _____

CITY: _____ COUNTY: _____ STATE: OH

REPORT DATED: 11/2000 REPORT TYPE: Memo

REPORT PREPARER: EPA - SF/RCRA SITE TYPE: _____ GAO ☒ IG

DISCUSSION/RATIONALE: "Lead Confirmed" - site deferral to
RCRA is correct.

Special Initiative Flag entered.
See attached.

Report Reviewed/
Site Decision Made by: J. Reel Date: 11/15/00

Region 5 Revision of EPA Form # 9100-3, 11/00 - Special - IG Audit

US EPA RECORDS CENTER REGION 5



432043



State of Ohio Environmental Protection Agency
Northeast District Office

2110 E. Aurora Road
Twinsburg, Ohio 44087-1969

TELE (330) 425-9171 FAX (330) 487-0769

Bob Taft, Governor
Christopher Jones, Director

January 21, 2000

RE: NO FURTHER REMEDIAL
ACTION PLANNED FOR
FORD MOTOR CO.,
LORAIN ASSEMBLY
PLANT, LORAIN COUNTY,
OHD004227815

Ms. Jeanne Griffin
Ohio Early Action Project Manager, SE-4J
Office of Superfund
U.S. EPA
77 W. Jackson Blvd.
Chicago, IL 60604

Dear Ms. Griffin:

Ohio EPA, Division of Emergency and Remedial Response, has completed a file review for the Ford Motor Company - Ohio Assembly Plant Site (Ford), located at 5401 Baumhart Road, Lorain, Ohio, as identified in the Inspector General's RCRA Deferral Audit of sites referred to as "RCRA Handlers" not subject to corrective action.

Ford is currently under Director's Final Findings and Orders with the Division of Hazardous Waste Management (DHWM) for closure of several hazardous waste storage units at the site. In conjunction with these units, DHWM is also conducting periodic generator compliance monitoring inspections at the site. DERR found no information which identified other site contamination concerns, at this time. However, if additional information becomes available indicating CERCLA-related concerns have been identified at the site, Ohio EPA will re-evaluate the site for future actions under CERCLA.

There are environmental problems at the site, however, because of the ongoing RCRA activity. Ohio EPA recommends that this site be deferred to RCRA. Additionally, this site is listed on the U.S. EPA's NCAPs database as a low priority for consideration under RCRA Corrective Actions.

This should fulfill the 2000 Site Investigation commitment for this site.

If you have any questions or need additional information, please contact me at 330-963-1160.

Sincerely,

Nancy Zikmanis, CHMM
Project Coordinator
Division of Emergency and Remedial Response

NZ/kss

Enclosures

cc: Laura Fay, Ohio EPA Project Officer/CO
Sheila Abraham, DERR/NEDO
Steve Love, DERR/NEDO

**RCRA HAZARDOUS WASTE GENERATOR
COMPLIANCE EVALUATION INSPECTION CHECKLIST**

Company: FORD MOTOR CO. - LORAIN ASSEMBLY PLANT EPA I.D.: 04D 004 22781
 Street: 5401 BAUMHART ROAD City: LORAIN
 County: LORAIN State: Ohio Zip: 44053
 Mailing Address: N/A
 (IF DIFFERENT FROM ABOVE)
 Telephone: 440-282-0724 (WARREN COHEN) Fax: 440-282-0910
 Owner/Operator: N/A
 (IF DIFFERENT FROM ABOVE)
 Street: N/A
 City: N/A State: N/A Zip: N/A
 Inspection Date(s): 4-20-99 Time(s): _____
 Inspection announced? Yes _____ No ☒ If so, how much advance notice given? N/A

	Name	Affiliation	Telephone
Inspectors:	JASON ROMP	OHIO EPA-DHWM-NEDO	330-963-1258
	GREG ORR	" " " "	" - " - 1189
	KRIS CODGER	" " " "	" - " - 1266
Facility Rep(s):	Tom CASADA	FORD	440-282-0997
	JIM LUCAS	FORD	?
	MIKE BEST	HERITAGE	440-277-7087

GENERATOR CLASSIFICATION

WASTE MANAGEMENT ACTIVITY

<input type="checkbox"/> Conditionally Exempt SQG (CESQG)	<input type="checkbox"/> Containers
<input type="checkbox"/> Small Quantity Generator (SQG)	<input type="checkbox"/> Tank(s)
<input checked="" type="checkbox"/> Large Quantity Generator (LQG)	<input type="checkbox"/> Other (specify)*
<input type="checkbox"/> No Generation	

CESQG: < 100 Kg (approx. 25-30 gallons) of waste in a calendar month

SQG: between 100 and 1000 Kg (about 25 to under 300 gallons) of waste in a calendar month

LQG: > 1000 Kg (~ 300 gallons) of waste in a calendar month or > 1 Kg of acutely hazardous waste in a calendar month

NOTE: To convert from gallons to pounds: Amount in gallons x Specific Gravity x 8.345 = Amount in pounds

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Process Description

At the Ford Lorain Assembly Plant, Ford finishes the Ford Econoline Vans by adding the chasis and trim at a rate of about sixty vans per hour. Since October 1997, Ford has greatly reduced the amount of painting it does at this facility due to the passenger vehicle system (i.e., formerly used for the Mercury Cougar and Ford Thunderbird cars) being placed on 'warm idle.' Currently, painting at the Lorain facility is limited to episodic touch up and/or repairs made to the vans. Ford's Avon Lake, Ohio facility is the primary painting facility for the vans.

Waste Management & Generation - Hazardous and Non-Hazardous (See Ford's 1998 Annual Haz. Waste Report for amounts of each hazardous wastestream)

During the inspection, the following hazardous and non-hazardous wastestreams were noted:

Hazardous paint related wastes are episodically generated and managed off-site by Heritage.

Miscellaneous hazardous waste acids and bases (and related sludges) and peroxides/oxidizers are generated episodically and are managed off-site by Heritage.

Hazardous waste halide lamps containing mercury are managed off-site by Heritage.

Hazardous waste aerosols (e.g., aerosol cans) are managed off-site by Heritage

Hazardous waste petroleum/non-chlorinated solvent (i.e., Agitine) is used in four parts washers (i.e., two in the power tool area and two in the maintenance cribs) at the plant. Ford also uses petroleum solvents in other areas of the plant for paint operations, etc. Waste solvents are managed off-site by Heritage Environmental Services, Inc. (Heritage). Ford maintains its own parts washers. Ford has not used chlorinated solvents in the last several years.

Hazardous waste purge containing methyl ethyl ketone from windshield installation is managed off-site by Heritage.

Hazardous waste methyl alcohol is episodically generated and managed off-site by Heritage.

Hazardous waste gasoline and diesel fuels are managed off-site by Heritage.

Hazardous waste mercury is episodically generated from spills. Ford is aware of the reportable quantity requirements related to mercury.

REMARKS - GENERAL INFORMATION / Page 2 of 3

Hazardous waste sulfuric acid and related sludges from the facility's deionized water plant and WWTP are managed off-site by Heritage.

Hazardous waste isocyanates from reactors used to produce a sound deafening foam are episodically generated and managed off-site by Heritage.

Lead-acid batteries are managed off-site by Heritage. Unbroken batteries are recycled, while broken batteries are manifested off-site as hazardous waste.

PCB ballasts are managed off-site by S.D. Meyers, a secondary contractor of BFI.

Rags and wipes contaminated with oils, paints, solvents, etc. are dry cleaned off-site and brought back to the facility for reuse. Very small quantities of the rags are disposed of as hazardous waste. Heritage handles this disposal.

Fluorescent lamps and mercury apparatus (e.g., monometers, thermometers, mercury switches, etc.) are recycled by Environmental Recycling of Toledo, Ohio.

Non-hazardous used oil from equipment and vehicle maintenance is managed off-site by Browning Ferris Industries (BFI) through off-site solidification and landfilling. Ohio EPA recommends that Ford consider having this waste recycled, rather than solidified and landfilled.

Non-hazardous used anti-freeze is recycled off-site through a BFI secondary contractor.

Non-hazardous windshield sealer is managed off-site by BFI.

Non-hazardous waste water treatment plant (WWTP) sludge is managed off-site by BFI.

Hazardous Waste Management Units & Approximate Locations

Ford has about eight satellite accumulation areas throughout its plant. Areas for satellite accumulation are near the following plant columns: MM-19, K-5 and OB-5 (paint wastes); KK-18 (mercury & PCB ballasts); B-6 (gasoline/diesel wastes); J-8 and U-8 (windshield wastes containing MEK); and, the Butler Building (miscellaneous wastes). The parts washer wastes are not considered satellite accumulation areas because upon generation, the wastes are taken directly to the less than ninety day hazardous waste accumulation area.

They have four less than ninety day hazardous waste underground storage tanks (UST) outside at the rear/east side of the plant. The tanks, which are no longer used, were used for storing paint related hazardous wastes. The tanks were emptied and cleaned out in January, 1998. Ford may begin removing and closing these tanks this summer, 1999.

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Ford is already closing another less than ninety day hazardous waste storage tank closure unit (i.e., UST #30), which they cleaned and removed in May, 1991. The UST #30 closure unit is immediately east of the aforementioned four hazardous waste UST.

Ford has two less than ninety day hazardous waste accumulation areas outside at the rear/east side of the plant. One accumulation area, which is diked and located north/northeast of the aforementioned UST, is for liquid/pumpable hazardous waste drums. The other accumulation area, which is not diked and located east of the pumpable drum accumulation area, is for solid/non-pumpable hazardous waste drums.

Regulatory/Enforcement History

Following Ohio EPA-DHWM's 1985 hazardous waste compliance evaluation inspection, Findings & Orders (F&O) were issued to Ford on 02/06/86 for the closure of four hazardous waste surface impoundments. Ford was last inspected by Ohio EPA-DHWM for compliance with Ohio's hazardous waste laws and regulations in June, 1992. F&O were issued on 01/27/94 to Ford following the 1992 inspection. The F&O ordered the closure of UST #30, as well as the return to compliance with other violations. The closure of UST #30 is ongoing.



Superfund Site Assessment Data Management

EPA - Office of Emergency and Remedial Response

Reporting RCRA Deferral Activities

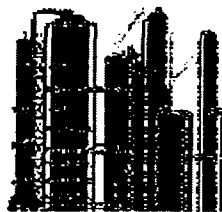
July 2000

What are RCRA Deferral Sites?

A March 1999 report by EPA's Office of the Inspector

General (OIG) identified 2,941 Superfund sites that have been deferred to the Resource Conservation and Recovery Act (RCRA)

program. The OIG report determined that 842 sites are being appropriately addressed under RCRA, and 2,099 need further attention.



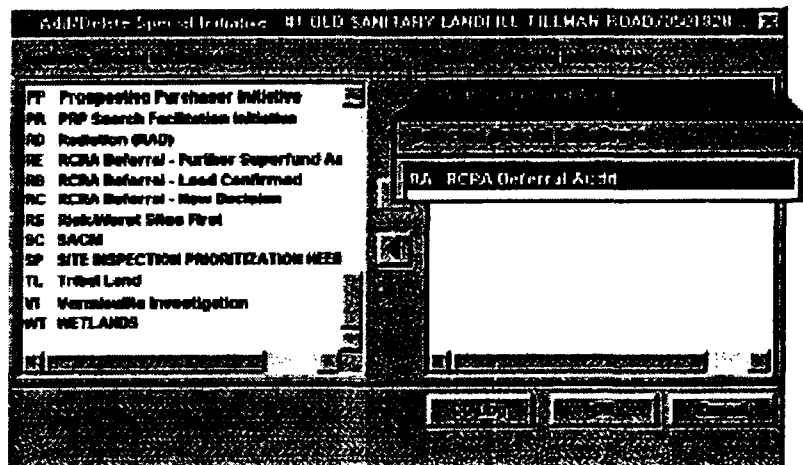
EPA has developed two measures to track and evaluate these 2,099 sites in WastELAN. First, EPA Headquarters will flag the sites using the existing "RCRA Deferral Audit" Special Initiative, and Regions will be able to enter one of the following three new Special Initiatives: RCRA Deferral—Lead Confirmed; RCRA Deferral—New Decision; or RCRA Deferral—Further Assessment. The second measure adds a new WastELAN action, "Site Reassessment", that will track reassessment activities at sites.

How Will Tracking RCRA Deferral Sites Benefit EPA?

Use of the one existing and three new Special Initiatives and the new WastELAN action, "Site Reassessment," will allow EPA to:

- Readily identify the OIG RCRA deferral sites and accurately report their current status;
- Effectively track reassessment activities, recording dates and fiscal year accomplishments; and
- Receive proper credit for reassessment work performed in the Regions.

Additionally, these new initiatives allow the Regions to track the status of RCRA deferral sites that were identified in the 2,099 sites needing further attention. The new "Site Reassessment" action does not replace current assessment actions; it serves as a supplement in instances when some assessment is needed to evaluate new information on a site, yet a full assessment action is not warranted under the Superfund program.



How Will Regional Staff Maintain RCRA Deferral Activities?

Regions will be responsible for entering the new WastELAN Special Initiatives. The new Regional Special Initiatives are:

- RCRA Deferral—Lead Confirmed: Indicates that the RCRA-Deferral decision was accurate; i.e., there is no change to the current RCRA deferral status.
- RCRA Deferral—New Decision: Indicates that EPA is correcting or changing the currently-listed decision from "Deferred to RCRA" to another indicator.
- RCRA Deferral—Further Superfund Assessment: Indicates that EPA needs to conduct further assessment to update the status. (This initiative should be used in conjunction with the new Site Reassessment action.)

Regions will also be responsible for recording Site Reassessment activities using the new WastELAN action.



rcradfrl.pdf

Who Can I Contact for More Information?

Jennifer Griesert	Data Sponsor	(703) 603-8888	griesert.jennifer@epa.gov
WastELAN Techline		(703) 247-4711	techline@marasconewton.com

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5

DATE: November 20, 2000

SUBJECT: Lead Confirmation for Sites Identified in the FY'1999 OIG Audit of Sites Deferred to RCRA

FROM: Joseph Dufficy
Brownfield/Early Action Section
Superfund Division

Gerald Phillips
Corrective Action Manager
Waste, Pesticides & Toxics Division

TO: SITE FILES

This memo is to memorialize the lead decisions for those sites that the Office of the Inspector General (OIG) identified in the March 1999 report, entitled "Superfund Sites Deferred to RCRA." The OIG audit recommended that Superfund reevaluate all deferred sites not in the RCRA corrective action workload to determine the best legal authority to address the sites, and any response actions necessary in order to improve communication between the programs. The OIG also recommended that the two programs should reach agreement on which program will take lead responsibility for each of the sites by the end of calendar year 2000.

The OIG lists for Region 5 included (493 sites) 'Sites Subject to Corrective Action', and (184 sites) 'RCRA Handlers' that may not be subject to corrective action. These two lists (attached) have been reviewed by both programs and are identified with one of the three Special Initiative flags. For those sites that have been scored under the RCRA NCAPS model, they are noted as RCRA Deferral - Lead Confirmed. For those sites to be addressed under Superfund, they are identified on the attached lists as RCRA Deferral - New Decision or RCRA Deferral - Further Assessment. All sites requiring reassessments by Superfund will have findings provided to RCRA for their information.

Attachments (2) *

cc: State Site Assessment Contacts
EAPMs

* FOR ATTACHMENTS PLEASE REFER to the following two SITE FILES:

AKZO COATINGS INC. 14D006390553

AG COMMUNICATION Sys. 14D005070545